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May 26, 1993

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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Federal Communications Commission
Aviation & Marine Branch
M-S 1700 C-1
2025 "M" Street NW
Washington, DC 20554

92-2571

I am responding to your request for input from experienced boaters regarding proposed revisions of regulations on the use of VHF Marine Radios.

As a person who spends many hours each year monitoring the VHF radio in the Puget Sound area, I feel that excessive use of Channel 16 is a serious problem. After listening to the chatter for a while (most of which is legal and/or required but not really necessary) there is a tendency to "turn off" -- either mentally or actually turn down the volume -- neither of which is conducive to safety and good practice.

I believe that air time on Channel 16 can be significantly reduced by adopting a few minor changes. I offer the following suggestions:

1. ELIMINATE THE CURRENT REQUIREMENT TO USE STATION CALL LETTERS whenever calling or receiving a call. "Whiskey Alpha Bravo Five Niner Six Seven" repeated three times each for both the calling and the receiving station uses up a tremendous amount of Ch 16 air time.

I was at a boaters meeting where an FCC representative from the Seattle office admitted to the attendees of the meeting that less than 5% of all radio procedure violators are able to be identified by use of the call letters. I believe elimination of this requirement should be seriously considered.

2. DESIGNATE A CHANNEL THAT ALL MARINAS, HARBORS, YACHT CHARTERS, ETC. ARE TO MONITOR AND USE. Essentially adopt the Canadian system of not licensing these shore facilities to use Ch 16. Canada uses Ch 68 south of Campbell River, Ch 73 north of Campbell Riv. I think one common channel ie. 73, should be sufficient.

I hear a tremendous amount of Ch 16 use by boaters trying to call various marinas and often not getting a response; then calling out to ask if anyone knows what channel that marina monitors. And then a response from someone who may know. All of which could be eliminated by everyone knowing that all marinas monitor only Ch 73.

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3. OFFICIALLY ENCOURAGE ALL VESSELS TO USE DUAL CHANNEL MONITORING when available and, when traveling with or planning to meet other boats, to make their initial contacts on a preselected working channel.

I hear a tremendous amount of Ch 16 by the same boats and between the same boats as they call back and forth over a days cruise.

4. Consistent with #3 above, and because of the dual channel monitoring technology currently available, OFFICIALLY ENCOURAGE INITIAL CALLERS TO STATE THE CHANNEL ON WHICH THEY ARE CALLING. "Windjammer, Windjammer, Seadog on Ch 16"

Otherwise, if I am monitoring both Ch 16 and Ch 09 and I hear such a call, I don't know on which channel to respond.

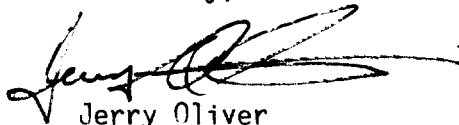
5. Except for Mayday, Pan, and Security, THERE SHOULD BE NO NEED TO REPEAT ANYTHING THREE TIMES. Two times for the called station, one time for the calling station should be sufficient. There is also a tendency to be less articulate when repeating the same material.

6. ENCOURAGE BREVITY. I think the U.S. Coast Guard violates this concept quite often. The Canadian Coast Guard in Vancouver refer to themselves on the air as "Vancouver Coast Guard". The U.S. Coast Guard in Seattle refer to themselves as "U.S. Coast Guard Group Seattle Washington" -- and they always repeat it three times. Well, everyone knows that the Coast Guard in Seattle is the U.S. Coast Guard, that Seattle is in the state of Washington, and we really don't care whether on their organizational chart they are a station, a group, a flotilla or whatever. What would be wrong with the brevity of "Coast Guard Seattle" or "Seattle Coast Guard"?

As you well know the problem of Ch 16 excessive use is not a single problem with a single solution. The problems are many including excessive regulation and inconsiderate users. Whatever can be done to eliminate the unnecessary and undesirable chatter in the ears of those of us who judiciously monitor Ch 16 when aboard our boats will be greatly appreciated.

Hoping the above suggestions can be implemented, I remain,

Sincerely,

A handwritten signature in dark ink, appearing to read "Jerry Oliver", with a stylized, flowing script.

Jerry Oliver